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6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF WASHINGTON
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9 UNITED STATES OF AMERICA,

10 Plaintiff,

NO: 2:19-CR-0088-TOR-1, 2

11
12 v.

PROTECTIVE ORDER

13 PAUL CLAY GILCHRIST,
14 COLTON LAMONT BETHA,

15 Defendants.
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18 The United States of America, having applied to this Court for a discovery
19 protective order regarding the disclosure of discovery and sensitive information
20 (the “Discovery”) to Defense Counsel in connection with the United States’
21 discovery obligations, and the Court finding good cause therefore, it is HEREBY
22 ORDERED:
23

24 1. The United States’ Unopposed Motion for Discovery Protective Order (ECF
25 No. 24) is **GRANTED**.

26 2. Pursuant to the discovery obligations previously imposed by the Court, the
27 United States is authorized to disclose discovery in its possession and any
28 Protected Information contained therein. As used herein, “Protected Information”

1 means sensitive personal, business, and financial information of defendants and
2 third parties, including for example, social security numbers, driver's license and
3 identification information, taxpayer identification numbers, tax information and
4 records, salary information, dates of birth, birth places, addresses, phone numbers,
5 e-mail addresses, personal photographs, cooperating witness information, and
6 financial and business account numbers and information.

7 3. Counsel for Defendants (hereinafter "Defense Counsel") shall not share or
8 provide any discovery items produced by the United States in this case with
9 anyone other than designated Defense Counsel, defense investigators, retained
10 expert witnesses, and support staff. Defense Counsel may permit their respective
11 Defendant to view unredacted discovery items in the presence of Defense Counsel,
12 defense investigators, and support staff. Defense Counsel personally, or through
13 Defense Counsel's investigators and support staff, may show unredacted discovery
14 items to witnesses in regard to items or events about which a witness may have
15 personal knowledge. Defense Counsel and his investigators and support staff shall
16 not allow his respective defendant or witnesses to copy Protected Information
17 contained in the discovery.
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19 4. The discovery and information therein may be used only in connection with
20 the litigation of this case and for no other purpose. The discovery is now and will
21 forever remain the property of the United States. At the conclusion of the case,
22 Defense Counsel will return the discovery to the United States, will certify that it
23 has been shredded, or, if the materials are still needed, will store it in a secure place
24 and not disclose it to third parties. If the assigned Defense Counsel is relieved or
25 substituted from the case, Defense Counsel will return the discovery to the United
26 States or certify that it has been shredded.
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28 5. Defense Counsel shall store the discovery in a secure place and will use

1 reasonable care to ensure that it is not disclosed to third persons contrary to the
2 Protective Order.

3 6. Defense Counsel shall be responsible for advising their respective defendant,
4 employees, witnesses, and other members of the defense team of the contents of
5 this Protective Order.

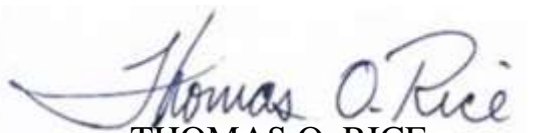
6 7. This Protective Order shall also apply to any new Defense Counsel that may
7 later become counsel of record in this case.

8 **IT IS SO ORDERED.** The District Court Executive is hereby directed to
9 enter this order and furnish copies to counsel.

10 DATED May 29, 2019.



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A handwritten signature in blue ink that reads "Thomas O. Rice".

THOMAS O. RICE
Chief United States District Judge